

From: [Hensley, Dave](#)
To: ["Mike Major"](#)
Subject: RE: BOE GDC Report
Date: Monday, April 24, 2017 3:55:00 PM

Okay.

Dave Hensley
Physical Scientist
U.S. EPA Region 7

From: Mike Major [mailto:mmajor@powerfulcompliance.com]
Sent: Monday, April 24, 2017 3:54 PM
To: Hensley, Dave <Hensley.Dave@epa.gov>
Subject: RE: BOE GDC Report

Let's speak today at 4 pm (10 minutes).
Mike

On Apr 24, 2017 3:49 PM, "Hensley, Dave" <Hensley.Dave@epa.gov> wrote:

Hi Mike,

Are you available at 4 today, or 3:30 tomorrow?

Dave Hensley
Physical Scientist
U.S. EPA Region 7

From: Mike Major [mailto:mmajor@powerfulcompliance.com]
Sent: Monday, April 24, 2017 3:44 PM
To: Hensley, Dave <Hensley.Dave@epa.gov>
Subject: RE: BOE GDC Report

Dave, thanks for the response. Please let me know when you've had a chance to review and we'll talk (including CBI treatment)

Mike

On Apr 24, 2017 1:48 PM, "Hensley, Dave" <Hensley.Dave@epa.gov> wrote:

Hi Mike,

The week was good. Hope it was for you too.

I am reviewing the final draft now, and will get back with you soon.

Do not send confidential business information (CBI) via email. Transmit it to me in a

more secure way. Via the post office or other carrier.

EPA's regulations that govern the confidentiality of business information are contained in 40 C.F.R. Part 2, Subpart B. You may assert a business confidentiality claim covering part or all of the information submitted, in the manner described by 40 C.F.R. § 2.203(b). There are some special rules governing certain information obtained under the Clean Air Act at 40 C.F.R. § 2.301. To claim CBI the document(s) need to be marked confidential. Portions of documents can be claimed confidential also.

We have a couple of forms that are used on inspection to document receipt of CBI. I think using them in this situation is a good idea also.

The first form is a Confidentiality Notice (Please find attached). It gives you some information and resources on CBI. The second page gives a place to record the person from the facility providing the documentation with the CBI claim, a spot for their signature, and a place to list the documents with the CBI claim. Please have this form filled out and included with the CBI documents.

The second form is a Notice and Opportunity to Substantiate Confidential Business Information Claim. I will send this to you once I have received the CBI. It asks the facility to answer 9 questions as to how long we should maintain the documents as CBI, and why the documents are CBI. It also includes a contact for Krystal Stotts Stotts.Krystal@epa.gov my groups CBI coordinator. She can answer any questions you have on CBI. The second form should be sent to her attention, within 15 days of our receipt of the CBI documents.

Dave Hensley
Physical Scientist
U.S. EPA Region 7

From: Mike Major [mailto:mmajor@powerfulcompliance.com]
Sent: Friday, April 21, 2017 5:27 PM
To: Hensley, Dave <Hensley.Dave@epa.gov>
Subject: BOE GDC Report

Dave,
I hope your week was a good one. I have attached the final draft of BOE's GDC, which I would like to confirm with you and finalize next week. Please see the attached files, which I hope are very close. I will submit the final version after discussing with you. As you appreciate, the GDC details a plants vulnerabilities. BOE will like to keep the final version as confidential business information. I will ask about this request/procedure also. Have a great weekend,

Michael Major
Principal
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[+1.414.699.5404](tel:+14146995404)

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